

March 4, 2011

Mr. Gary Miller, Remedial Project Manager  
U.S. EPA, Region 6  
Superfund Division (6SF-RA)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Re: *Draft Remedial Investigation Report*, dated February 4, 2011 - Comments  
Gulfco Marine Maintenance Federal Superfund Site  
Freeport, Brazoria County, TX

Dear Mr. Miller:

The Texas Commission on Environmental Quality (TCEQ), Remediation Division, has completed review of the *Draft Remedial Investigation (RI) Report (Report)*, dated February 4, 2011. The draft Report was prepared by Pastor, Behling, & Wheeler, LLC of Round Rock, Texas on behalf of LDL Coastal Limited LP, Chromalloy American Corporation, and Dow Chemical Company, collectively referred to as the Gulfco Restoration Group. This Report is consistent with the Work Plan and appears to meet the requirements of an RI. In general, the Report provides a thorough and accurate account of the field activities and results, nature and extent of contamination, and contaminant fate and transport. The Baseline Human Health Risk assessment concluded that there were no unacceptable risks for any of the identified current or future exposure scenarios except for future exposure to indoor industrial worker if a building were constructed over impacted groundwater in the North Area. Additionally, the Report presents ecological evaluations that have been conducted at this site to date, including the Draft Baseline Ecological Risk Assessment (BERA). The BERA concluded that because of a lack of evidence of site-related toxicity, development of ecologically-based remediation goals was not necessary and that no ecologically-driven response actions are proposed. The TCEQ has previously agreed with all these conclusions and has no comments on the ecological evaluation in this Report.

The vertical extent of contamination in groundwater is limited to the shallow zones A and B. Groundwater in these units and underlying groundwater-bearing zones within the upper 200 feet of the subsurface is Class 3 and not useable due to naturally elevated Total Dissolved Solid concentrations. However, TCEQ would like to present the following comments related to the site groundwater general description from the Executive Summary and Section 8, Conclusions:

1. Executive Summary, Page 4, and Section 8, Conclusions, Page 99. In the "Groundwater" subsection, please revise the sentence "The extent of VOCs exceeding extent evaluation comparison values was generally limited to a localized area..." to "The extent of VOCs exceeding extent evaluation comparison values **and Dense Non-Aqueous Phase Liquid (DNAPL)** was generally limited to a localized area..."
2. Executive Summary, Page 4 and Section 8, Conclusions, Page 99. Although the groundwater classification as a Class 3 based on the salinity and groundwater usage has been mentioned in the Report, it should also be included in the Executive Summary and Section 8.

If you have any questions please, contact me at (512) 239-6368 or Larry Champagne at (512) - 239-2158.

Sincerely,

Ludmila Voskov, P.G., Project Manager  
Superfund Section  
Remediation Division

Lv/lv

Cc: Larry Champagne, TCEQ  
Kip Haney, TCEQ, Toxicology Section